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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KRYSTAL LOPEZ and DAMANY
BROWNE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

ZARBEE'S, INC.,

Defendant.

Case no. 22-cv-4465-CRB

**STIPULATION REGARDING
DEPOSITIONS**

1 Plaintiffs Krystal Lopez and Damany Browne and Defendant Zarbee's, Inc. ("Zarbee's")
2 (collectively, the "Parties"), through their respective attorneys of record, hereby enter into the
3 stipulation below with reference to depositions:

4 WHEREAS, Plaintiffs commenced the above-captioned action (the "Action") on August
5 2, 2022;

6 WHEREAS, on June 14, 2024, Plaintiffs requested a telephonic conference with the Court
7 regarding deposition objections;

8 WHEREAS, on June 14, 2024, the Court ordered the parties to meet and confer regarding
9 the dispute and, if the parties reached agreement, to memorialize the agreement in a stipulation
10 filed with the Court, ECF No. 79;

11 WHEREAS, the parties met and conferred on June 17, 2024, and have amicably agreed to
12 resolve their dispute pursuant to the terms stipulated below;

13 IT IS HEREBY STIPULATED that:

14 (1) For all future depositions in this Action, counsel defending the deposition shall be
15 limited to making the following objections during the deposition: objections on
16 privilege grounds; objections to form; and, for depositions pursuant to Federal Rule of
17 Procedure 30(b)(6), objections to questions seeking testimony that falls outside the
18 scope of the deposition topics on which the witness has been designated to testify.

19 (2) By objecting to form without further stating the basis for the objection (including but
20 not limited to the compound, vague, or speculative nature of the question, the fact that
21 the question has been asked and answered, the fact that the question calls for a legal
22 conclusion, and/or that the question mischaracterizes the witness's testimony or
23 assumes facts not in evidence), the objecting party expressly preserves and does not
24 waive the objection if the deposition testimony is later proposed to be introduced as
25 evidence at trial or other proceedings.

26 (3) In light of the resolution of this dispute, the Parties agree that this Court's discovery
27 management conference scheduled for June 21, 2024 can be cancelled.

28 **IT IS SO STIPULATED.**

1 Dated: June 20, 2024

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